

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

KENNETH DAVIDSON and JANA DAVIDSON,
INDIVIDUALLY and On Behalf of Their Minor
Children JCD and KSD, and THOMAS FARMER,

Plaintiffs,

v.

ROCKWELL INTERNATIONAL
CORPORATION, ROCKWELL AUTOMATION,
INC., ROCKWELL COLLINS, INC. AND/OR
ROCKWELL COLLINS AEROSPACE &
ELECTRONICS, INC., THE BOEING
COMPANY, TWIN COMMANDER AIRCRAFT,
LLC, AIRESEARCH MANUFACTURING
COMPANY, STANDARDAERO BUSINESS
AVIATION SERVICES, LLC, THE SIGNAL
COMPANIES, ALLIEDSIGNAL AVIONICS,
INC. AND/OR ALLIED-SIGNAL AEROSPACE
AVIONICS COMPANY, ALLIEDSIGNAL
AEROSPACE SERVICES CORPORATION,
HONEYWELL INTERNATIONAL, INC.
FAIRCHILD CONTROLS CORPORATION,
CARPE DIEM AVIATION SERVICES OF
MISSOURI, INC. D/B/A CD AVIATION
SERVICES, CD AVIATION L.L.C., EAGLE
CREEK AVIATION SERVICES D/B/A NAPLES
JET CENTER, AND NORTHROP
GRUMMANN CORPORATION AND/OR
NORTHROP GRUMMAN SYSTEMS
CORPORATION,

Defendants.

1:14 CV 03886

**FIRST AMENDED
SUPPLEMENTAL
COMPLAINT**

1. The First Amended And Supplemental Complaint of Plaintiffs KENNETH DAVIDSON and JANA DAVIDSON, individually and on behalf of their Minor Children JCD

and KSD, hereinafter sometimes referred to as complainant #1, and THOMAS FARMER, hereinafter sometimes referred to as complainant #2, of legal age, respectfully represents that Plaintiffs amend their original Complaint filed on May 30, 2014, as follows:

PARTIES

Supplementing Paragraph 3 as follows:

P. STANDARDAERO BUSINESS AVIATION SERVICES, LLC, a foreign corporation, domiciled in Delaware, with its corporate office located 1524 W. 14th Street #110, Tempe Arizona, 85296, and having appointed as agent for Service of Process The Corporation Trust Company, Corporation Trust Center, 1209 Orange Street, Wilmington Delaware, 19801.

Supplementing Paragraph 4 as follows:

O. STANDARDAERO BUSINESS AVIATION SERVICES, LLC, a foreign corporation, domiciled in Delaware, with its corporate office located at 1524 W. 14th Street #110, Tempe Arizona, 85296, and having appointed as agent for Service of Process The Corporation Trust Company, Corporation Trust Center, 1209 Orange Street, Wilmington Delaware, 19801.

SECOND CLAIM FOR RELIEF

Amending Paragraph 14 as follows:

14. Since the manufacture of the engine, Airesearch has undergone several

mergers and acquisitions, merging into The Signal Companies, and subsequently into AlliedSignal Avionics, Inc. And/or Allied-Signal Aerospace Avionics Company and/or Alliedsignal Aerospace Service Corporation, which then bought out Honeywell International, Inc, and took the Honeywell name. On information and belief, Airesearch is currently owned by defendant Standardaero Business Aviation Services, LLC.

Complainants aver that a cause of the injuries sustained by complainants was the fault of defendants, Aireseaerch and/or The Signal Companies, and/or AlliedSignal Avionics, Inc. and/or Allied-Signal Aerospace Avionics Company and/or AlliedSignal Aerospace Service Corporation and/or Honeywell International, Inc and/or Standardaero Business Aviation Services, LLC, whose actions violated the New York Products Liability law in the following, non-exclusive respects:

- a. The product was defective, which defect rendered the product not reasonably safe for its intended use, and which defect caused the complainants' injuries;
- b. The defect existed at the time the product left the defendant's hands;
- c. The defect was not discoverable by these complainants through the exercise of reasonable care;
- d. Failure to act reasonably in designing, testing, manufacturing, selling, inspecting or marketing the subject engine and/or its components;
- e. Failure to warn complainants of unreasonably dangerous condition of the subject engine and/or its components;
- f. Failure to conform to an express or implied warranty;

g. Failure, generally, to meet the generally accepted standard of care in the above described situation.

JURY TRIAL DEMAND

Amending the Jury Trial Demand as follows:

Pursuant to Rule 38 of the Federal Rules of Civil Procedure, KENNETH DAVIDSON and JANA DAVIDSON, individually and on behalf of their Minor Children JCD and KSD, and THOMAS FARMER hereby demand a trial by jury of all issues that are so triable.”

Plaintiffs renew and reiterate all of the allegations of the original Complaint as amended and supplemented herein.

Dated: Baton Rouge, Louisiana
September 25, 2014

GARVEY SCHUBERT BARER
(Co-Counsel)

deGRAVELLES, PALMINTIER,
HOLTHAUS & FRUGE
(Co-Counsel, Admitted Pro Hac Vice

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CERTIFICATE

I hereby certify that I have forwarded a copy of the above and foregoing pleading to all counsel of record through the Court's electronic filing system this 25th day of September, 2014.

/s/Michael C. Palmintier
MICHAEL C. PALMINTIER